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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WT Docket No. 97-112

CC Docket No. 90-6

In the Matter of )

Cellular Service and Other Commercial )  
Mobile Radio Services in the Gulf of )  
Mexico )

Amendment of Part 22 of the Commission's )  
Rules to Provide for Filing and Processing )  
of Applications for Unserved Areas in the )  
Cellular Service and to Modify Other )  
Cellular Rules )

To: The Commission

**COMMENTS**

Comes now Wireless One Holding Company, L.P. and submits these its Comments in response to the Commission's Second Further Notice of Proposed Rule Making ("NPRM") in the above-matter released April 16, 1997. The date for filing Comments was extended from June 2 to July 2, 1997 by Order released May 30, 1997.

**BACKGROUND**

Wireless One Holding Company, L.P. ("Wireless One") provides cellular services in Southwest Florida including Florida RSAs 1 and 3 which border the Gulf of Mexico. Wireless One is the successor to Florida Cellular RSA Limited Partnership ("Florida Cellular") which has provided service in Southwest Florida since 1990.

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### COMMENTS

Wireless One supports the thrust of the NPRM and lauds the Commission for undertaking a re-examination of its cellular service Rules as they apply to the Gulf of Mexico service area. The establishment of a comprehensive regulatory scheme should reduce conflict between water-based and land-based carriers and facilitate development of competitive services in the Gulf of Mexico region, both on land and over water.

Wireless One agrees that the public interest is best served by allowing all water-based and land-based service area boundaries (SAB) that extend into the Coastal Zone to be incorporated into the CGSA of the carrier currently providing service, provided that the authorizations were properly granted in accordance with the cellular Rules in effect at the time of the grant.

Wireless One, in Florida RSA 1 and 3, has, over the last several years, built out its system and the entire coastal area of the Gulf region of RSAs 1 and 3 are covered through formerly authorized filings with the Commission. Thus, consistent with the Commission's proposal herein, these areas should become part of the CGSA of the land-based carrier. Any placement of transmitters, whether land-based or water-based, that would result in a SAB extension into the protected CGSA of the existing carrier, should be subject to the existing SAB extension Rules.

The extension of a proposed Coastal Zone, which will consist of that portion of the Gulf of Mexico service area extending from the coast line of the Gulf to the 12-mile off-shore limit, would allow us to greatly improve the quality and reliability of service to customers of our system. Subscribers would be able to receive uninterrupted cellular service improvements from current providers.

### CONCLUSION

Wireless One supports the thrust of the Second Further Notice of Proposed Rule Making dealing with its proposed cellular service Rules as they apply to the Gulf of

Mexico service area. The proposed Rules will serve the public interest by assuring that customers served by coastal contour extensions will not be forced to pay roamer rates to new entrants in their existing service area, and will allow for contour extensions by their serving carrier to the limit of the proposed Coastal Zone which may greatly improve the quality and reliability of coverage to off-shore boaters. Said contour extensions can doubtless provide for appropriate health and safety responses that are currently unavailable.

We urge the Commission to consider these Comments in developing its final Rules in this proceeding.

Respectfully submitted,

**WIRELESS ONE HOLDING COMPANY, L.P.**

By:



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Dated: June 30, 1997